

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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IN RE:

MARIBELLAX GROUP, LTD.,

Chapter 11  
Reorganization  
Case No.: 10-40156 (CEC)

Debtor.

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**APPLICATION IN SUPPORT OF MOTION TO  
APPROVE DISCLOSURE STATEMENT**

MICHAEL T. SUCHER, ESQ., an attorney duly licensed to practice in the Courts of the State of New York and in this honorable Court affirms the following to be true under penalties of perjury.

1. Your affirmant is the attorney for KEVIN BARRY LOVE, an interested party (the "Proponent"), and as such is fully familiar with the facts.

2. Proponent is the sole shareholder of the debtor herein.

3. On January 11, 2010, MARIBELLAX GROUP, LTD. filed a voluntary petition under Chapter 11 of the United States Bankruptcy Code.

4. No committee has been appointed herein.

5. By order entered June 4, 2010, this Court directed the appointment of a Chapter 11 Trustee. Thereafter Kenneth P. Silverman qualified as operating trustee herein, and remains in possession of the debtor's property.

6. On June 15, the Proponent filed a Plan and Disclosure Statement, noted on the court's docket, respectively, as documents #160 and #161.

7. It is now necessary to submit the disclosure statement to all parties in interest and for the court to consider the adequacy of the same pursuant to 11 U.S.C. §1125, which states in part:

(b) An acceptance or rejection of a plan may not be solicited after the commencement of the case under this title from a holder of a claim or interest with respect to such claim or interest, unless, at the time of or before such solicitation, there is transmitted to such holder the plan or a summary of the plan, and a written disclosure statement approved, after notice and a hearing, by the court as containing adequate information.

8. Proponent believes that the Disclosure Statement, as filed, contains adequate information within the meaning of 11 U.S.C. §1125, which states, in pertinent part:


(1) "adequate information" means information of a kind, and in sufficient detail, as far as is reasonably practicable in light of the nature and history of the debtor and the condition of the debtor's books and records, including a discussion of the potential material Federal tax consequences of the plan

to the debtor, any successor to the debtor, and a hypothetical investor typical of the holders of claims or interests in the case, that would enable such a hypothetical investor of the relevant class to make an informed judgment about the plan....

9. Notice of this Application is made to the debtor, the trustee, the US Trustee and all creditors listed on debtor's schedules, those who have filed proofs of claim and those parties who have filed notices of appearance.

WHEREFORE, it is respectfully requested that this court grant Proponent's motion, approve the Disclosure Statement as filed, and declare that the same contains adequate information, and for such other and further relief as to the Court may seem just and proper.

Dated: Brooklyn, New York  
June 22, 2011

  
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MICHAEL T. SUCHER, ESQ.